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December 19, 1996

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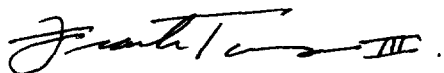
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re: Comments of the Governor of Guam; CC Docket No. 96-45

Dear Mr. Caton:

Enclosed please find the Comments of the Governor of Guam in the matter of the Federal-State Joint Board Recommendations on Universal Service.

Sincerely,



Frank C. Torres, III
Executive Director

Enclosures (original and 5 copies)

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
)
)

Federal-State Joint Board on)
Universal Service)
_____)

CC Docket No. 96-45

COMMENTS
OF THE
GOVERNOR OF GUAM

ON THE RECOMMENDED DECISION
OF THE UNIVERSAL SERVICE
FEDERAL-STATE JOINT BOARD

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Filed by:

Carl T.C. Gutierrez
Governor of Guam

December 19, 1996



Summary of Comments

The Governor of Guam supports many of the recommendations of the Joint Board. In particular, the Governor commends the members of the Board for recognizing that special treatment may be required for insular areas, particularly those which are also rural, such as Guam.

It is clear that the Board has sought to carry out the principle embodied in Section 254(b)(3) of the Telecommunications Act:

Consumers in all regions of the Nation, including low income consumers and those in rural, insular and high cost areas, should have access to telecommunications and information services, including interexchange services and advanced telecommunications and information services, that are reasonably comparable to those services provided in urban areas and that are available at rates that are reasonably comparable to rates charged for similar services in urban areas.

With those principles in mind, the Governor offers the following comments on the Joint Board's Recommended Decision:

- Internet Access

In the case of Guam, and other insular areas, unique circumstances, including the fact that Guam and other Pacific insular areas are not on or adjacent to the National Information Infrastructure, make support for "advanced information services," such as the Internet, necessary.

- Affordability

The Governor believes that the Commission should make clear that rates that are not affordable or reasonably comparable can be supported by universal service support mechanisms. In its Recommended Decision, the Joint Board found that factors other than the absolute level of rates could affect affordability. Such factors might include local calling area size, income levels, population density, etc. The Governor suggests, that in the case of Guam, the anomalous circumstances of the Guam Telephone Authority (GTA) be taken into consideration. At present, local ratepayers do not benefit from any universal service support mechanism, including Lifeline and Linkup. Furthermore, Guam

ratepayers subsidize local rates through payment of non-integrated, internationally-based interexchange rates. Thus, some consideration needs to be given so that Guam is treated fairly and equitably.

- Toll-Free Access

It may be necessary to incorporate some safeguards in the treatment of toll-free access for the Pacific Island territories in order to ease the transition to fully integrated rates. Most importantly, as a matter of policy and in order to meet the "reasonably comparable" test, all nationwide toll-free numbers should automatically include Guam in the service area, unless the customer chooses not to obtain truly nationwide service. Moreover, if the service provider offers nationwide postalized rates, there should be no separate rate for the Pacific Island territories.

- Schools and Libraries

The Commission should provide for a mechanism, in addition to the discount matrix, to ensure that schools with less resources are treated fairly and equitably. In order to address continuing inequities, the Commission should provide for additional discounts to schools when the lowest bid received for access is over 115% (or some reasonable threshold) of the national average. If a school is still not able to afford basic service, despite the discounts specified in the matrix, further discounts should be given, provided the school is able to prove its inability to pay.

- Telemedicine

The Governor urges the Commission to address Guam's unique geographic situation in order to equitably provide for affordable telemedicine services. Because there are no "urban areas" in Guam, the Commission should use urban west coast areas for purposes of determining proper access charges.

The Governor of Guam looks forward to continuing to work with the Commission to ensure that the residents of Guam, and other rural areas, have reasonably comparable and affordable telecommunication rates and services.

OFFICE OF THE GOVERNOR
TERRITORY OF GUAM

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)

Federal-State Joint Board on)
Universal Service)

CC Docket No. 96-45

**COMMENTS
OF THE
GOVERNOR OF GUAM**

I. INTRODUCTION

The Governor of Guam (Governor), hereby submits these comments in response to the November 8, 1996 Recommended Decision of the Federal-State Joint Board.¹ The Governor is participating in this proceeding because of the importance of universal service and related funding mechanisms for Guam. The Governor will continue to work with the Commission in implementing those areas of the Telecommunications Act of 1996² which focus on the needs of

¹ Recommended Decision, FCC 96J-3 (rel. Nov. 8, 1996), (Recommended Decision).

² Telecommunications Act of 1996, Pub.L.No. 104-104, 110 Stat. 56 (1996) (the "Act").

residents of remote, insular or rural areas, including Guam.³

The Governor supports many of the recommendations of the Joint Board and commends the members of the Board for recognizing that special treatment may be required for insular areas, particularly those which are also rural, such as Guam. It is clear that the Board has sought to carry out the principle embodied in Section 254(b)(3) of the Telecommunications Act:

Consumers in all regions of the Nation, including low income consumers and those in rural, insular and high cost areas, should have access to telecommunications and information services, including interexchange services and advanced telecommunications and information services, that are reasonably comparable to those services provided in urban areas and that are available at rates that are reasonably comparable to rates charged for similar services in urban areas.⁴

Bearing in mind that the Act requires insular area consumers be afforded reasonably comparable rates and services to those provided in other parts of the U.S., the Governor of Guam urges the Commission to recognize that the transition of Guam into the United States Public Switched Telephone Network (US PSTN) and its

³ Guam is a small island 30 miles long and between 4 and 8 miles wide covering an area of about 212 square miles located 6,000 miles from San Francisco, 3,700 miles from Honolulu and 1,550 miles from Tokyo., Guam's population is about 140,000. Guam is the social, political and economic hub of Micronesia. It was formerly a Spanish colony and is now an unincorporated U.S. Territory governed by the U.S. Congress under the Territorial Clause of the Constitution.

⁴ 47 U.S.C. § 254(b)(3), (emphasis added).

Universal Service support mechanisms should not be accomplished haphazardly. Rather, the transition will require careful planning. The people of Guam cannot afford a possible reduction in service during this transition.

Guam is currently undergoing unprecedented changes in the way telecommunications services are provided and rates are charged. At no time in history has any U.S. jurisdiction had such a radical change thrust upon it so quickly⁵. While these changes will benefit the people of Guam, implementing such rapid change is challenging. In addition, Guam must also contend with the changes and uncertainties in implementing the Telecommunication Act of 1996. Guam, perhaps more than any other location, is profoundly and positively affected by the Act. Nevertheless, Guam's telecommunications industry still needs definitive direction in

⁵ On July 1, 1997, Guam will be included for the first time in the North American Numbering Plan (NANP), changing the Guam country code "671" to a U.S. area code of "671" within the NANP. The Guam Telephone Authority (GTA) will implement Equal Access, requiring Guam subscribers to choose a primary interexchange carrier (IXC). In addition, Guam will implement a dialing plan consistent with the rest of the United States. GTA has applied to become a member of the National Exchange Carriers Association (NECA). On July 1, 1997, GTA will cease charging the IXCs a percentage of revenue and will implement NECA Access Tariffs. At the same time, GTA will implement number portability for 800/888 services by providing query dips through a leased line to a Signal Control Point (SCP) in accordance with the NECA tariff. Also, on July 1, GTA intends to implement new local rates to adjust for the shortfall of income lost from the interexchange carriers and GTA intends to implement Lifeline and LinkUp tariffs for low-income residents. Finally on August 1, 1997, the IXCs will be required to implement rate integrated tariffs for service to and from Guam, consistent with their existing domestic tariffs.

implementing the numerous changes. Furthermore, safety nets must be in place to decrease the possibility of adverse impacts on Guam ratepayers.

Affordable access to the Internet and mechanisms to encourage and facilitate toll free customers to include Guam and the other Pacific insular areas within their toll free service area are mandatory if the inclusion of Guam and insular areas in the US PSTN is to be meaningful. The Governor of Guam will continue to work with the Commission to ensure that the people of Guam enjoy the benefits of comparable services and rates as mandated by the Act.

Finally, Guam's unique location, as well as the changes being made in telecommunications (NANP inclusion and rate integration), impact the Joint Board recommendations as applied to schools and libraries in Guam, and the use of telemedicine. The Governor agrees with the Joint Board that these circumstances cause the need for some additional thought as to how best to apply Universal Service to the insular areas.

II. Internet Access

In its Recommended Decision, the Joint Board declined to support toll access to Internet providers, relying instead on increased demand to reduce or eliminate the need for customers in

rural areas to place toll calls to obtain Internet service.⁶ In the case of the Pacific Island territories, however, unique circumstances make support for "advanced information services," such as the Internet, necessary.

Guam and other Pacific insular areas are not on or adjacent to the National Information Infrastructure (NII or the "Information Super Highway"). Today, Information Service Providers (ISPs) must obtain a digital connection at international rates between Guam and the "on-ramp" to the NII in the mainland United States. Because of the extraordinary costs of these international links to connect Guam to the information highway, ISPs on Guam currently charge between \$60 and \$45 per month for unrestricted access.⁷ This cost is, in a large part, due to cost of the ISP's connection to the West Coast of the United States.

Internet users on Guam, not only pay significantly higher rates for usage, but receive inferior service due to bandwidth congestion on the connecting trunks. Because of the high costs

⁶ See Recommended Decision, ¶ 69.

⁷ This should be compared with a \$19.95 unlimited access charge now prevalent in urban areas. See, New York Times, December 17, 1996, p. 1. A charge in Guam more than twice the charge in New York does not pass the "reasonably comparable" test. In the Washington, D.C. Area, rates for unlimited internet access have been recently advertised as low as \$9.50 per month, four times lower than the cost in Guam. See, The Washington Post Business Section, December 16, 1996, p.26.

for these trunks, ISPs have been forced to be frugal in obtaining desirable bandwidth in order to constrain costs and prevent even higher rates for Guam's Internet users.

Universal Service funding should be used to mitigate the costs of the connection between Guam and the West Coast of the United States for Internet service. This will provide the residents of Guam broadband access on an affordable, reasonably comparable basis. Otherwise, Internet connection for Guam residents will continue to be prohibitively expensive.

Section 254(b)(3) of the Act requires access to insular areas, including Guam, at rates that are reasonably comparable to rates charged for similar services in urban areas. Guam is unique because of its distance from the U.S. Mainland and because the NII "superhighway" has not been built into Guam⁸. These affect current costs. Allowing use of universal service funding mechanisms to support broadband connection to the Internet from a remote, insular area will enable Guam residents to afford access to the information highway.

⁸ National Science Foundation and other federal programs defray the cost of the primary backbone of the information superhighway. If broad band access for Guam is provided in a similar manner, the need for Universal Service assistance would be mitigated.

III. Toll Free Services

The Joint Board recommends that no support be given for toll free access for Pacific Island territories for the time being, at least until inclusion within the North American Numbering Plan and nationwide rate averaging. The Governor does not disagree with this approach, however, it may be necessary to incorporate some safeguards in the treatment of toll-free access for the Pacific Island territories in order to ease the transition to fully integrated rates. Most importantly, as a matter of policy and in order to meet the "reasonably comparable" test, all nationwide toll-free numbers should automatically include Guam in the service area, unless the customer chooses not to obtain truly nationwide service. Moreover, if the service provider offers nationwide postalized rates, there should be no separate rate for the Pacific Island territories.

This approach is consistent with the rights of each party to an 800/888 service: the customer, the service provider and the user. The customer, typically a business, should have the right to decide which areas of the country should be included in the toll-free service area. Likewise, the customer should not be required to offer nationwide access. The customer should also have the right to receive calls at comparable, integrated rates from all areas of the country, should the customer so choose.

The 800/888 service provider should have the right to receive query dip service at comparable, integrated rates for all areas of the country.⁹ Finally the 800/888 user in Guam should have the right to make calls on a 1+ basis to every 800/888 customer who includes Guam in the service area.

Recognition of these rights will lead to introduction of toll free access, without requiring universal service funding, that satisfies the principle of "reasonable comparability". The Governor does strongly believe, however, that toll free service providers should be required to automatically include Guam in "nationwide" service areas (those including 50 states and Puerto Rico/Virgin Islands). Service providers should also be required to inform 800/888 customers of their option not to include the Pacific Island territories should they so choose.

At present, Guam users can dial 880 or 881 to pay for transport to access toll free customers who do not include Guam within their service areas. The Governor would not propose that this service be discontinued immediately. There will likely be some time before 800/888 customers can make business decisions about whether to include Guam (at rate integrated rates) within their service areas. During this transition period, 880/881

⁹ The Governor of Guam understands that the Guam Telephone Authority intends to join in the National Exchange Carrier Association (NECA) tariff for this service.

service should continue to be offered to Guam users to allow access to 800/888 customers who choose not to include Guam within their service areas. Rates for the 880/881 transport service should be rate integrated, with all other domestic long distance services.

IV. Affordability

Section 254(b)(1) establishes the principle that quality services should be just, reasonable and affordable.¹⁰ This principle must, of course, be viewed in connection with the principle that rates and services for rural areas must be reasonably comparable to rates and services for urban areas.

In its Recommended Decision, the Joint Board found that factors other than the absolute level of rates could affect affordability. Such factors might include local calling area size, income levels, population density, etc. The Governor suggests that in the case of Guam, the anomalous circumstances of the Guam Telephone Authority (GTA) be taken into consideration.¹¹

¹⁰ 47 254(b)(1).

¹¹ See, Note 3 *infra*. See also, Comments of GTA, CC Docket No. 96-45, December 19, 1996.

GTA is currently following an Integrated Compliance Plan to bring itself into conformance with FCC requirements. At present however, local ratepayers do not benefit from any universal service support mechanism, including Lifeline and Linkup, and they subsidize local rates through payment of non-integrated, internationally-based interexchange rates. The Governor of Guam and GTA are both committed to regularizing GTA's practices and intend to file jurisdictionally separated tariffs to be effective on July 1, 1997.

A possible effect of these tariffs may be a significant increase in local rates, so as to take them out of the zone of "reasonable comparability" or "affordability" for a rural insular area of only 77,000 access lines in the calling area. The Governor expects that GTA will raise these issues with the Guam Public Utilities Commission, but it may be too late unless the FCC is willing to commit to universal service funding for rates that are not affordable or reasonably comparable.

The Governor believes that the Commission should make clear that rates that are not affordable or reasonably comparable can be supported by universal service support mechanisms.

V. Schools and Libraries

Perhaps the most important universal service issue is to ensure that our schools and libraries are able to connect to the information superhighway. For Guam, as well as the rest of the nation, affordable internet access for schools and libraries will open up a world of opportunity for our children. Telecommunication and other data services must be offered in Guam at rates no higher than the rates charged to public institutions in the mainland United States.¹²

We appreciate the Joint Board's efforts to recommend a mechanism for determining how the level of discount will be determined¹³. However, there are variables in addition to student participation in schools lunch programs and the cost of service which determine a school's ability to pay for connection to the information highway.

The Commission should provide for a mechanism, in addition to the discount matrix, to ensure that schools with less resources are treated fairly and equitably. For example, some areas, such as Guam, face basic service costs that are demonstrably higher

¹² Comments of the Governor of Guam, CC Docket No. 96-45, filed April 10, 1996.

¹³ See, Recommended Decision, ¶ 555.

than other areas. A 60% discount for services to schools in Guam, may still result in significantly higher costs than a 60% discount for services in an area whose basic service costs are not as significant.

In order to address continuing inequities, the Commission should provide for additional discounts to schools when the lowest bid received for access is over 115% (or some reasonable threshold) of the national average. Such a mechanism will provide a test to ensure that schools otherwise disadvantaged because of variables not contemplated in the Joint Board's recommendations are given a fair and equitable discount.

If school still not able to afford basic service, despite the discounts specified in the matrix, further discounts should be given, provided the school is able to prove its inability to pay. State Utility Commissions could be used to determine a school's ability to pay, with the Commission setting up the policies and guidelines for those additional discounts.

VI. Health Care Providers

Because of the great distance to major medical centers, the application of telemedicine in Guam is compelling. Current distance-based charges for telecommunication services will result in high costs for telemedicine for Guam and the other insular

areas. The Governor urges the Commission to address Guam's unique geographic situation in order to equitably provide for affordable telemedicine services.

Guam, does not conveniently fit into the Joint Board's recommendations for determining costs based on nearby urban areas and, specifically, OMB's MAS listing. Guam has no designated metro areas under OMB's MAS listing. The Governor recommends, therefore, that the Commission list as rural those insular areas not designated as metro in the OMB MAS¹⁴.

The Commission could still examine the costs in relation to rates charged in the nearest U.S. city. Because there are no "urban areas" in Guam, the Commission should use urban west coast areas for purposes of determining proper access charges for telemedicine.¹⁵ For insular areas without urban medical centers, the Commission should consider a universal support between the insular area medical facility and the supporting medical center.

¹⁴ See, Recommended Decision, ¶ 431 and, also, Comments of the Governor of Guam at 5.


¹⁵ Reply Comments of the Governor of Guam, CC Docket No. 96-45, filed May 7, 1996.

Conclusion

The Governor of Guam will continue to work with the Commission to ensure that the residents of Guam have reasonably comparable and affordable rates and services, including local service, long distance, toll-free and information services.

Towards these goals we expect to work with the Commission and the industry to achieve: (1) a deliberate and planned transition to full telecommunications service and rate integration with the rest of the United States that will accommodate the needs of both Guam's carriers and ratepayers; (2) affordable and meaningful access to information technology for schools and libraries; and, (3) access for insular areas to urban medical centers.

Respectfully submitted,


Carl T.C. Gutierrez
Governor of Guam

December 19, 1996

CERTIFICATE OF SERVICE

I, Frank C. Torres, III, do hereby certify that a copy of the foregoing Comments of the Governor of Guam, was sent by first class United States mail, postage prepaid, or by hand delivery or facsimile where indicated by an asterisk (*), this 19th day of December, 1996 to the following:

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